

NEXUS BANKRUPTCY
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Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
RIVERSIDE DIVISION

In re:

TAUREAN E WRIGHT,
Debtors.

Case No.: 6:25-bk-11843-SY

Chapter 13

**STIPULATION AND REQUEST TO
CONTINUE CONFIRMATION HEARING**

Hearing:

Date: October 7, 2025

Time: 1:30 PM

Courtroom: 302

Debtor, by and through counsel, Benjamin Heston, and Deutsche Bank National Trust Company ("Lender"), by and through its counsel, David Coats, respectfully request and stipulate as follows:

1. The Confirmation Hearing on Debtor's Fourth Amended Chapter 13 Plan is presently scheduled for October 7, 2025 at 1:30 p.m.
2. Due to the fact that the mortgage is currently in the name of Jean Baranowski, Counsel for the Lender is currently working to provide Debtor with the application necessary to assume the mortgage secured by the Debtor's Real Property. Once completed, the mortgage assumption will not only resolve most of the Lender's concerns, but also many of the concerns and objections raised by Jean Baranowski.
3. The under-signed parties agree that additional time of approximately 45 days is needed to allow Debtor to pursue and finalize the proposed assumption.

- 1 4. Furthermore, on September 22, 2025, Jean Baranowski reached out to Debtor's Counsel
2 to request additional time to submit her objection to confirmation. Debtor Counsel
3 tentatively agreed to an extension to September 29, 2025, with the understanding that
4 Debtor would retain an opportunity to reply by September 30, 2025, if necessary.
5 Counsel further informed Ms. Baranowski that a continuance of the confirmation hearing
6 was being sought and that, if granted, her objection would not be due until 14 days prior
7 to the continued hearing date.
- 8 5. Accordingly, the requested continuance will benefit all parties in interest, including the
9 Debtor, Lender, and Ms. Baranowski.
- 10 6. For these reasons, it is respectfully requested that the Court continue the Confirmation
11 Hearing for a period of approximately 45 days.

12
13 Respectfully Submitted,

14 **NEXUS BANKRUPTCY**

15 /s/Benjamin Heston

16 Date: September 23, 2025

BENJAMIN HESTON,
Attorney for Debtor

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19 **ROBERTSON, ANSCHUTZ, SCHNEID, & CRANE, LLP**

20 David Coats

21 Date: September 23, 2025

DAVID COATS,
Attorney for Creditor,
Deutsche Bank National Trust Company